## LIPMAN & BOOTH, LLC

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January 29, 2020

The Hon. Frederic Block United States District Judge Eastern District of New York 225 Cadman Plaza Brooklyn, New York 11201 Via ECF

Re: <u>United States v. Mark Kocaj</u>,

Indictments 19-CR-575 (FB) & 19-Cr-577 (FB)

Dear Judge Block:

The defendant is at liberty upon terms of bail that include home detention and GPS monitoring. Accordingly, he requests a modification of the terms of release to permit travel to Caio restaurant in Eastchester, New York on February 2, 2020, leaving his home at 5:00 pm and returning by 11:00 pm the same day for purposes of attending a family gathering. A.U.S.A. Keith Edelman consents to this request and I have advised US Pre-trial Services Officer Leo Barrios (SDNY) and Officer Carter (EDNY) via email and am unaware of any objections.

Wherefore, it is respectfully requested that the defendant's bail conditions be modified to permit travel to Eastchester, New York on February 2, 2020.

Respectfully,
/s
Christopher Booth

Cc: AUSA Keith Edelman: Keith.Edelman@usdoj.gov USPO Leo Barrios: Leo\_Barrios@nyspt.uscourts.gov

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